

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

CHELSEY HARRIS,
a/k/a "Ms. Chinn,"

Defendant.

SEALED INDICTMENT

24 Cr.

24 CRIM 541

COUNT ONE

(Murder-for-Hire Conspiracy Resulting in Personal Injury and Death)

The Grand Jury charges:

1. In or about December 2023, in the Southern District of New York and elsewhere, CHELSEY HARRIS, a/k/a "Ms. Chinn," the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to travel in and cause another person to travel in interstate and foreign commerce, and to use and cause another person to use the mail and a facility of interstate and foreign commerce, with intent that a murder be committed in violation of the laws of a State and the United States as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value, which resulted in personal injury to one person and the death of another person, to wit, HARRIS and others conspired to lure an individual ("Victim-1") to locations in New York City where Victim-1 could be shot; and on or about December 24 and December 26, 2023, HARRIS—in exchange for a cash payment from co-conspirators—lured Victim-1 to a nightclub in Queens, New York, where gunmen shot and injured Victim-1 and killed Clarisa Burgos, who was with Victim-1.

(Title 18, United States Code, Section 1958.)

SPECIAL FINDINGS REGARDING THE MURDER OF CLARISA BURGOS

2. Count One of this Indictment is realleged and incorporated by reference as though fully set forth herein. As to Count One, alleging the murder of Clarisa Burgos, the defendant CHELSEY HARRIS, a/k/a “Ms. Chinn”:

- a. HARRIS was eighteen years of age or older at the time of the offense;
- b. HARRIS intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
- c. HARRIS in the commission of the offense, and in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (Title 18, United States Code, Section 3592(c)(5));
- d. HARRIS committed the offense as consideration for the receipt, and in the expectation of the receipt, of a thing of pecuniary value (Title 18, United States Code, Section 3592(c)(8)); and
- e. HARRIS committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)).

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Count One of this Indictment, CHELSEY HARRIS, a/k/a “Ms. Chinn,” the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds

traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- f. cannot be located upon the exercise of due diligence;
- g. has been transferred or sold to, or deposited with, a third person;
- h. has been placed beyond the jurisdiction of the Court;
- i. has been substantially diminished in value; or
- j. has been commingled with other property which cannot be subdivided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney